

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA

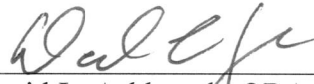
In re:)	
)	
CHARLES G. FREDENBURG and)	Case No. 14-12559-R
AMY M. FREDENBURG,)	Chapter 13
Debtors.)	

APPLICATION TO CONTINUE HEARING

COME NOW the Debtors, by and through their attorney, David L. Ashbaugh, and respectfully show to the Court as follows:

1. That after reviewing their payment records, it appears that the Debtors have missed several post-petition mortgage payments, and that they are not able to bring the same current with a lump sum payment.
2. That the Debtors believe that they will be able to modify the plan to provide for the payment of these arrearages, and not reduce the payment to the unsecured creditors.
3. That the Debtors request that the hearing scheduled for March 23, 2016 be continued in order to allow Debtors time to file their Motion to Modify Plan and their First Modified Plan.
4. That Mr. Jim Timberlake, the attorney for the creditor, does not have an objection to the hearing being continued.
5. That both parties agree that the Court may continue the automatic stay beyond the 30 day requirement of Section 362(e)(1).

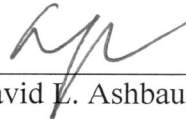
WHEREFORE, the Debtors respectfully request that the Court continue the hearing currently set for March 23, 2016 at 2:30 to another time convenient to the Court.



David L. Ashbaugh, OBA #349
Attorney for Debtors
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2016, a copy of the above Application was electronically delivered to Lonnie D. Eck, Katharine Vance, Assistant U.S. Trustee, and to Jim Timberlake, attorney for US Bank.



David L. Ashbaugh, OBA#349